

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

TEKLA BALFOUR-BROWNE, on behalf of himself and
all others similarly situated,

Plaintiffs,

-against-

EDEN FINE ART NY INC. d/b/a EDEN
GALLERY, CATHIA KLIMOVSKY, GUY
MARTINOVSKY, GAL YOSEF, and CETRA ART
CORPORATION,

Defendants.

25-cv-1142

**NOTICE OF MOTION TO
DISMISS**

PLEASE TAKE NOTICE that upon the accompanying Declaration of Gal Yosef dated March 27, 2025, the Declaration of Jason Gottlieb dated March 31, 2025 and the exhibit thereto, and the accompanying Memorandum of Law dated March 31, 2025, Defendants Eden Fine Art NY Inc., Cathia Klimovsky, Guy Martinovsky, Gal Yosef, and Cetra Art Corporation will move this Court, before the Honorable Margaret M. Garnett, United States District Judge, at the United States District Court for the Southern District of New York, 40 Foley Square, Courtroom 906, New York, New York 10007, at such date as the Court will determine, for an order pursuant to 12(b)(2) and 12(b)(6) of the Federal Rules of Civil Procedure dismissing the Complaint filed by Plaintiff Tekla Balfour-Browne, dated February 7, 2025 (ECF No. 1), and for such other and further relief this Court may deem just and proper.

Dated: New York, New York
March 31, 2025

MORRISON COHEN LLP

By: /s/ Jason Gottlieb
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Cetra Art Corporation*

CC: All counsel of record (via ECF)